

August 17, 2022

Re: Groups across Canada welcome international investigation into the condition of Wood Buffalo National Park, Canada's largest national park facing the biggest dangers

Dear Reactive Monitoring Mission leads,

As a group of fifteen Indigenous organizations and civil society organizations, we write to the leads of the IUCN/World Heritage Centre Reactive Monitoring Mission for Wood Buffalo National Park to express our collective concern with the deterioration of Outstanding Universal Values (OUV) of Wood Buffalo National Park World Heritage Site and express our agreement with decision **44 COM 7B.190** by the World Heritage Committee that the property likely meets the criteria for inscription on the List of World Heritage in Danger.

The Outstanding Universal Values of Wood Buffalo National Park cannot be overstated, as they are globally unique and deeply interconnected with the relationship Indigenous Peoples have to the area.

The Outstanding Universal Values of Wood Buffalo National Park (hereafter, the Park) that are protected under the World Heritage Convention are of international importance. Highlights among them include one of the largest boreal deltas in the world, the Peace Athabasca Delta; breeding habitat of the Endangered whooping crane; one of the greatest concentrations of migratory birds in North America; an enormous carbon store to combat climate change; and a unique wild relationship between threatened wood bison populations and wolves.

More than half a decade since the last Reactive Monitoring Mission, Wood Buffalo National Park continues to have an uncertain future.

Unfortunately, many of the characteristics for which the park gained World Heritage status are in serious decline and/or significantly negatively impacted by unresolved stressors outside of the park. Dangers to the Park are greatly exacerbated by the ongoing lack of adequate and effective management systems for the known major threats to the Park from hydroelectric projects on the Peace River, oil sands activities along the Athabasca River and climate change.

Today's reality for the Park: Major threats without a major response.

While we commend the Parks Canada Agency, the State Party representative for the World Heritage Convention, for developing the Wood Buffalo National Park Action Plan, it has not prevented the emergence of major new threats to the Park and it has not resulted in major improvements in the interjurisdictional areas of water governance and other reforms necessary for the conservation of the Park. We particularly note:

- ***Threats associated with oil sands tailings and effluent have increased:*** Despite evidence of seepage, inadequate regulatory oversight and risks to OUV, tailings ponds upstream of the Park continue to expand. Provincial and federal governments are now considering altering the protective regulations related to tailings management to authorize the release of "process affected waters" into one of the main tributaries of the Peace Athabasca Delta, which could harm downstream waters and communities, including the Northwest Territories, who have not

been included in the discussions.

- ***Provincial governments continually fail to take action to address threats to Wood Buffalo National Park and are allowing new threats in important areas:*** Wood Buffalo National Park is perpetually threatened by lack of coordination from sub-national governments of Government of Alberta and Government of British Columbia. Though several pieces of the Action Plan are dependent on action by either provincial governments, neither has made commitments to implement corrective actions. Rather, provincial management decisions continue to threaten the Park without mitigation or concern for downstream impacts on Wood Buffalo National Park:
 - The Government of Alberta is pushing forward a proposal for the release of treated oil sands tailings into the Athabasca River, despite an absence of any evidence that treated tailings can be safely released in the volumes necessary.
 - There are known effect pathways from the oil sands on Wood Buffalo National Park downstream, as confirmed by the Strategic Environmental Assessment (2018)¹. Despite this, the Alberta Energy Regulator has issued 484 oil sands leases (which cover an area of 563,000 hectares) and approved over 100 oil sands schemes (or projects) since the last mission in 2016. The expansions of the Canadian Natural Resources Limited (CNRL) Horizon North Pit and Suncor Base Mine are both underway – which would add over 33,000 hectares of new mines.
 - The Government of Alberta’s landuse planning (*via* “sub-regional plans”) continues to facilitate oil sands expansion in a way that threatens the Park. Since the 2016 mission, no improvements have been made to the land use plan that governs oil sands development, despite an independent review panel confirming that the land use plan fails to manage cumulative effects².
 - The Government of British Columbia and BC Hydro have not yet determined water release mechanisms on the Peace River, despite early signs of willingness to be collaborative.
 - The Government of British Columbia has re-affirmed its commitment to building the Site C hydroelectric dam on the Peace River, while no impact assessment has adequately considered downstream impacts on Wood Buffalo. Furthermore, the United Nations Committee on the Elimination of Racial Discrimination called for the B.C. government to suspend construction due to Indigenous rights violations³.

- ***No government has committed resources for the implementation of the Action Plan beyond 2024.*** This leaves critical short, medium and long-term conservation actions without necessary support and prevents effective planning for undertaking the major operations necessary for the

¹ 1 Milestone 3 – Final SEA Report: Strategic Environmental Assessment of Wood Buffalo National Park World Heritage Site – Executive Summary. May 2018. Independent Environmental Consultants (IEC).

https://www.pc.gc.ca/en/pn-np/nt/woodbuffalo/info/action/SEA_EES/bulletin

² Lower Athabasca Regional Plan Review Panel, 2015. “Review panel report 2015 : Lower Athabasca Regional Plan” <https://open.alberta.ca/publications/review-panel-report-2015-lower-athabasca-regional-plan>

³ “United Nations instructs Canada to suspend Site C dam construction over Indigenous rights violations” by Sarah Cox, the Narwhal. January 9, 2019. <https://thenarwhal.ca/united-nations-instructs-canada-to-suspend-site-c-dam-construction-over-indigenous-rights-violations/>

conservation of the Park, including the improvement and strengthening of co-management of the Park with Indigenous communities.

- ***In contravention of legislative requirements, Canada is years behind on its obligation to review and update the 2010 Wood Buffalo National Park Management Plan.*** This underscores the many management and operational challenges and capacity limitations that still face the Park, including the drastic staffing and operational cuts from 2012.
- ***Wood bison conservation actions are moving slowly for herds surrounding the Park:*** The Government of Alberta made an important step in listing Wood Bison as “Threatened” under the Alberta Wildlife Act, but recovery planning is moving slowly and the Ronald Lake and Wabasca herds remain vulnerable to threats. Protections are slow, as Canada has not yet identified “critical habitat” for either herd, and the Wabasca process has not even been started. One oil company, CNRL, continues to suggest it will develop Ronald Lake habitat, despite the federal Environment Minister concluding that doing so would constitute an imminent threat to the recovery of the threatened herd.
- ***Canada’s oil sands monitoring system is anything but “world class”.*** The joint federal-provincial Oil Sands Monitoring program (OSM) has significant weaknesses that have since come to light through leaked documents⁴ and through environmental representatives in the program. The environmental sector has participated in OSM through their Technical Advisory Committees since its inception in 2012 and raised concerns about the effectiveness of the program during their tenure. The program is poorly designed and reflects a tragic inability to prioritize robust and transparent environmental monitoring. The program highlights the ongoing lack of adequate monitoring for oil sands activities that are known to impact the Park.
- ***Governments are not adequately involving civil society and the environmental sector.*** It is of great concern that governments have largely excluded all civil society organizations and independent scientific advice from every area of the Wood Buffalo National Park Action Plan.
- ***There have been no changes or improvements to water governance on the major tributaries that support the Park’s OUV:*** As stated by the Committee in decision **44 COM 7B.190**, we re-iterate that “it is of serious concern that mechanisms to determine and agree on environmental flow regulation, as recommended by the 2016 Reactive Monitoring mission and endorsed by the Committee in its Decision 41 COM 7B.2 are still not in place [six] years after the mission, let alone binding protocols or frameworks.” Water governance structures will be critical to meeting the co-management vision of Indigenous communities in the Park.

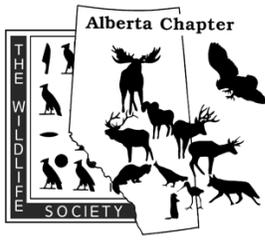
⁴ “Survey finds oilsands environmental monitoring ineffective after 10 years”, by Bob Weber for the Canadian Press. January 9, 2022. <https://edmontonjournal.com/business/energy/survey-finds-oilsands-environmental-monitoring-ineffective-after-10-years>

- The deficiencies set out in the July 14, 2021 [joint letter from civil society organizations and Indigenous communities](#) to the World Heritage Centre have not been resolved.

In light of the degraded health of the Park, and serious and specific dangers that continue to threaten the Park, and the significant challenges that undermine major components of the Wood Buffalo National Park Action Plan, we agree with Decision **44 COM 7B.190** and believe there is a strong and well supported case for inscription of the Park on the List of World Heritage in Danger until rapid and adequate conservation action is taken, and threats have been addressed for this globally significant ecosystem.

Sincerely,

Alberta Chapter of the Wildlife Society
Alberta Wilderness Association
Athabasca Chipewyan First Nation
Canadian Association of Physicians for the Environment – Alberta Regional Committee
Council of Canadians
CPAWS British Columbia
CPAWS National
CPAWS Northern Alberta
CPAWS Northwest Territories
David Suzuki Foundation
International Buffalo Relations Institute
Keepers of the Water
Nature Alberta
ShagowAskee Foundation
Wildlife Conservation Society Canada



Alberta Wilderness Association

